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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,	)	No. CR-13-408-JST
	)	
14 Plaintiff,	)	
	)	UNITED STATES' RESPONSE TO COURT'S
15 v.	)	INTENDED JUROR QUESTIONNAIRE
	)	
16 MUZAFFAR HUSSAIN,	)	
	)	
17 Defendant.	)	
	)	

18  
19 The United States respectfully submits a list of witnesses that *may* testify at trial:

20 Names of Witnesses Who May Testify At Trial:

- 21 1. Alice Quinn (ADP payroll service)
- 22 2. Ali Ahmad
- 23 3. Susan Arteché
- 24 4. Grace Duncan-Rowe
- 25 5. Jeffrey C. Jackson (Bank of America)
- 26 6. Munsoor Bebahany
- 27 7. Liz Nomura-Young (California Secretary of State)
- 28 8. Arezou Dadgar

9. Francesca Aguilera
10. Anthony Falcon
11. Joseph Hickey
12. Donna Howell
13. Naheed Hussain
14. Iqbal Khan
15. Maheen Khan
16. Renu Khetrappel
17. Cindy Lin
18. David Lowe
19. Russ Chong
20. Adam Gray
21. Julie Ryer
22. Gary Lukuc
23. Robert Myers
24. Philip Murphy
25. Anne Nilon
26. Representative - Social Security Administration (awaiting designation)
27. Amjad Saiyed
28. Willie Wilcox
29. Representative – EDD (awaiting designation)

The United States requests that the Court consider including the following questions for the juror

Questionnaire:

I. Knowledge of Defendant

1. Do you know or have you heard of the defendant, Muzaffar Hussain?
  - a. If you know him, how long have you known him and in what capacity?
  - b. If you have heard of him, what have you heard?

2. Have you, your family members or close friends ever worked at, visited, or had any other type of interaction with the following facilities?

A. Crossroads Home HealthCare and Hospice, Inc.;

B. Sunshine Home Health Care, Inc.;

C. Horizon Home Health Care, Inc.;

D. Ace Billing and Financial Services, Inc.;

If so, please describe the interaction and experience at each facility.

3. Some of the evidence may involve the health care industry, and health care facilities that serve senior citizens in particular. Do you have any experience with health care facilities that serve senior citizens other than those specifically mentioned in the previous question?

4. Have you, your family members or close friends ever had a bad experience with a health care facility?

5. Have you, a family member, or close personal friend ever been an officer of or held a management position at a health care facility?

## II. Experience with the Internal Revenue Service

1. Have you, any member of your family or close friends ever been employed by the Internal Revenue Service or the United States Government ?

a. If so, please describe the circumstances and position of employment.

2. Have you, any member of your family or close friends ever been audited by the Internal Revenue Service?

a. If so, did that audit result in any collection action?

3. Have you, any member of your family or close friends ever been the subject of an Internal Revenue Service investigation or other investigation conducted by the government?

a. If so, please describe the nature of the investigation and its outcome (at sidebar).

4. Have you, any member of your family or close friends ever been the subject of an Internal Revenue Service levy or lien to collect unpaid taxes?

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1           5.     Have you, any member of your family or close friends ever had a dispute with the  
2 Internal Revenue Service?

3           6.     To jurors who responded affirmatively to questions 1, 2, 3, or 4:  
4               a.     how long ago?  
5               b.     was the matter resolved to your satisfaction?  
6               c.     were you treated fairly by the government employees involved?  
7               d.     were you treated courteously by government employees?  
8               e.     as a result of that experience, do you hold any resentment toward the government,  
9 the IRS or any particular employee or employees of the government?

10          7.     To jurors who responded that the matter was not resolved to their satisfaction or that they  
11 were unfairly and/or discourteously treated by the government,  
12               a.     would your feelings prevent you from listening to the government's case and  
13 giving a verdict based solely on the evidence presented?

14          8.     Do you, any member of your family or close friends belong to an organization or group  
15 or association, that works for the abolition or revision of the tax laws of the United States?

16          9.     Do you, any member of your family or close friends hold strong personal or  
17 philosophical feelings about the tax system of the United States?

18               a.     If so, what are those feelings?  
19               b.     Would those feelings prevent you from reaching a fair and impartial verdict based  
20 only on the evidence in this case?

21          10.    Do you, any member of your family or close friends believe that the income tax laws of  
22 the United States are unconstitutional?

23          11.    This case involves an allegation by the United States that the defendant Muzaffar Hussain  
24 willfully failed to account for and pay over payroll taxes of a company that he owned and operated. Do  
25 you have any objection to the law that requires employers to withhold taxes from employees' paychecks  
26 and pay them to the government?

27          12.    Are you self-employed?  
28

1 13. Do you prepare your own tax returns?

2 14. Do you own or operate a small business?

3 15. Do you prepare or are you involved in the preparation of payrolls and the calculation and  
4 payment of payroll taxes?

5 16. Do you receive assistance preparing your returns?

6 17. Have you ever had any training in accounting?

7 18. Do you or does any member of your family have a personal feeling of distrust, animosity  
8 or suspicion of the Internal Revenue Service, or the Department of Justice or its employees? If so, please  
9 describe these feelings.

10 Respectfully submitted,

11 BRIAN J. STRETCH  
12 Acting United States Attorney

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15 Assistant United States Attorney  
16 Attorneys for the United States  
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